

THE LAW OFFICES OF
RICHARD MALAGIERE
A PROFESSIONAL CORPORATION
www.malagierelaw.com

Richard Malagiere
Member NJ & NY Bar
Registered Patent Attorney

250 MOONACHIE ROAD
3rd FLOOR
MOONACHIE, NJ 07074
201.440.0675
FAX: 201.440.1843

100 CHURCH STREET
SUITE 800
NEW YORK, NEW YORK 10007
212.879.5580
FAX: 212.879.5583

Giancarlo Ghione
Member NJ Bar
Michael Kahn
Registered Patent Agent
Leonard E. Seaman
Certified Civil Trial Attorney

***REPLY TO NJ OFFICE**

Writer's Direct Dial: 201.509.4180
Writer's e-mail: les@malagierelaw.com

December 28, 2022

VIA CM/ECF

The Honorable Andre M. Espinosa, USMJ
United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building and United States Courthouse
Court Room MLK 2D
50 Walnut Street
Newark, New Jersey 07102.

Re: Pallazi et al v. Cigna Health and Life Insurance Company
Civil Action No. 22-cv-6278

Dear Judge Espinosa:

This office represents plaintiffs in the above matter.

On December 14, 2022, I wrote to Your Honor seeking leave for plaintiffs to file an amended complaint adding claims against the defendant under ERISA (ECF # 7).

Your Honor endorsed my request as a Letter Order the following day (ECF # 8) directing that plaintiffs file their amended complaint by December 20, 2022 and providing defendant 30 days to answer.

When this case was removed by defendant from New Jersey state court, my colleague, Richard Malagiere, Esq., was the only member of this firm identified as

an attorney on this matter. As a result, the Court's order did not come to my attention through the ECF/CM system, and I only became aware of it today when I reviewed the docket.

To rectify this, I have filed a Notice of Appearance with the Clerk to ensure that all future filings come to my attention.

I have also filed the amended complaint. Plaintiffs respectfully request that the Court accept same *nunc pro tunc* and provide sufficient time for the defendant to respond.

We thank the Court for its assistance in this regard.

Respectfully submitted,

s/ Leonard E. Seaman
LEONARD E. SEAMAN

LES/me

cc: All counsel (via CM/ECF)
client (via e-mail)